

**NL INDUSTRIES/TARACORP SUPERFUND SITE GROUP**  
**Leed Environmental, Inc.**  
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April 8, 2019

**By Electronic Mail and First Class Mail**

Ms. Sheri L. Bianchin  
Remedial Project Manager  
Institutional Controls Coordinator  
U.S. Environmental Protection Agency Region 5  
77 West Jackson Boulevard (SR-6J)  
Chicago, IL 60604

**Re: NL Industries/Taracorp Superfund Site; Granite City, Illinois**  
**Consent Decree – Quarterly Progress Report 53 (January-March 2019)**

Dear Ms. Bianchin:

As required by the Consent Decree for the NL Industries/Taracorp Superfund Site (the “site”), two copies of this letter are submitted, on behalf of the NL Industries/Taracorp Superfund Site Group (“Group”), to provide the U.S. Environmental Protection Agency (“EPA”) with a quarterly progress report for activities performed during the period from January-March 2019.

**1. Actions Taken During Previous Quarter to Comply with the Consent Decree:**

- **Institutional Controls:** During the January-March 2019 period, the Group performed the following activities related to institutional controls: (a) the Group continued to edit 10 draft environmental covenants to address EPA’s comments; and (b) the Group continued to prepare draft administrative records and compile supporting documents for 15 denied access residential properties. The draft administrative records and supporting documents for the 15 denied access properties were submitted to EPA.
- **Groundwater Monitoring:** As part of groundwater monitoring activities at the site, the Group’s contractor, Environmental Works, Inc. (“EWI”), received approval from the Granite City Wastewater Treatment Plant and subsequently pumped leachate from a storage tank into the sanitary sewer manhole at 16<sup>th</sup> Street and Edison Street in Granite City for subsequent treatment at the Granite City Wastewater Treatment Facility. Upon receipt of laboratory analytical data, EWI prepared the Five-Year Review Groundwater Monitoring Report to document the results of the November 2018 groundwater monitoring event at the site. The Group submitted EWI’s Five-Year Review Groundwater Monitoring Report to EPA in February 2019.
- **Operation and Maintenance:** During the January-March 2019 period, the following operation and maintenance activities were performed at the site:

March 15	The Group's project coordinator sent information to Munie Greencare Professionals' ("Munie") new project manager to advise him regarding the scope of work for mowing vegetation on the 1555 State Street property and Taracorp pile property.
March 22	The Group's authorized Munie to perform vegetation control and mowing services on the properties at 16 <sup>th</sup> Street and State Street in 2019.

- **Project Coordination:** During the January-March 2019 period and in addition to items previously noted, the Group's project coordinator communicated with the following parties regarding work at the site:

January 8	Submitted Quarterly Progress Report 52 to EPA.
January 8	Sent a letter to EPA on the Group's behalf to provide Johnson Controls International, PLC's Form 10-K to satisfy the financial assurance requirements of the Consent Decree.
January 29	Sent a letter to EPA to seek EPA's approval to permanently abandon damaged groundwater monitoring well MW-105S.
February 25	Sent an email to EPA's project manager to provide an update regarding the status of groundwater monitoring activities at the site.
February 27	Sent EWI's Five-Year Review Groundwater Monitoring Report to EPA to document the results of the November 2018 groundwater sampling event at the site.
March 25	<p>Sent four emails to EPA's project manager to provide draft administrative records and supporting documents for the 15 denied access residential properties at the site [REDACTED], Non-Responsive [REDACTED], Non-Responsive [REDACTED], Non-Responsive [REDACTED], Non-Responsive [REDACTED], Non-Responsive [REDACTED], Non-Responsive [REDACTED], Non-Responsive [REDACTED], Non-Responsive [REDACTED].</p> <p>[REDACTED] Non-Responsive [REDACTED]</p>

## 2. Summary of Data and/or Results of Sampling and Tests Received:

- On February 27, 2019, the Group's project coordinator submitted EWI's Five-Year Review Groundwater Monitoring Report to EPA. The report included data from the analysis of groundwater collected during the November 2018 groundwater sampling event at the site.

**3. Work Plans, Plans, and Other Deliverables Completed and Submitted to EPA During the Previous Quarter:**

- Not applicable during this reporting period.

**4. Actions, Data Collection, and Implementation of Work Plans and Other Information Related to the Progress of Construction which are Scheduled to be Performed During the Next Six-Week Period:**

- The Group will continue to perform operation and maintenance activities at the site, as required. The Group's project coordinator will continue to update the Operation and Maintenance Plan as institutional controls activities are finalized.

- The Group will continue to edit 10 draft environmental covenants to address EPA's comments.
- The Group anticipates that a conference call or meeting will be held with EPA to continue to discuss the Group's responses to EPA's comments on the draft Institutional Controls Work Plan and other institutional controls issues. The Group will continue to address EPA's comments, update the Institutional Controls Work Plan, and implement institutional controls as the institutional controls activities are finalized.
- The Group will address comments, if any are received from EPA, in regard to the Five-Year Review Groundwater Monitoring Report, which was submitted to EPA in February 2019 to document the results of the November 2018 groundwater monitoring event.
- Upon receipt of EPA's approval, the Group will authorize EWI to abandon damaged monitoring well GMMW-105S.
- The Group will address comments, if any are received from EPA, in regard to: (1) the Soil Sampling and Analysis Report, which was submitted to EPA in January 2014 to document the results from soil sampling activities at 73 residential properties in April-May 2011, September 2012, June 2013, and October 2013; (2) the Soil Sampling and Analysis Report Addendum, which was submitted to EPA in December 2015 to document the results of soil sampling performed on three residential properties (Non-Responsive, Non-Responsive, and Non-Responsive) in June 2015 and one residential property (Non-Responsive) in November 2015; and (3) the Soil Sampling and Analysis Report Addendum No. 2, which was submitted to EPA in September 2016 to document the results of soil sampling activities performed on three residential properties (Non-Responsive) in August 2016.

**5. Problems Encountered, Anticipated Problems, Actual or Anticipated Delays, and Efforts Developed or Implemented to Mitigate Delays:**

- During groundwater sampling activities at the site in November 2018, EWI observed that the casing of monitoring well GMMW-105S was damaged. However, there was no indication of subsurface damage, and EWI collected a groundwater sample from the well for laboratory testing. The Group's project coordinator sent a letter to EPA on January 29, 2019 to seek EPA's approval to permanently abandon the damaged well.

**6. Modifications to Work Plans or Schedules Proposed to EPA or Approved by EPA:**

- Not applicable for this reporting period.

**7. Community Relations Activities During Previous Month or to be Undertaken During Next Six-Week Period:**

- Not applicable for this reporting period.

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Should you or your staff have questions or comments regarding this progress report, please contact this office at (610) 670-7310.

Very truly yours,

**LEED ENVIRONMENTAL, INC.**

A handwritten signature in black ink, reading "Jeffrey A. Leed". The signature is fluid and cursive, with the first name "Jeffrey" being more prominent and the last name "Leed" following in a similar style.

Jeffrey A. Leed  
Project Coordinator

cc: Nicole Wood-Chi, Esq. – U.S. Environmental Protection Agency (by electronic mail)  
Christopher Grubb, Esq. – U.S. Environmental Protection Agency (by electronic mail)  
Mr. Brian Conrath - Illinois EPA (by electronic mail and first class mail)  
Mr. Tom Miller – Illinois EPA (by electronic mail)  
Technical Committee, NL Industries/Taracorp Superfund Site Group (by electronic mail)